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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FORTINET, INC., a corporation

Case No. 3:13-cv-05831-EMC

Plaintiff,

VS.

SOPHOS, INC., a corporation, MICHAEL VALENTINE, an individual, and JASON CLARK, an individual.

**STIPULATION AND PROPOSED
ORDER TO EXTEND FACT
DISCOVERY DEADLINE FOR TWO
DEPOSITIONS**

Defendants.

SOPHOS INC. and SOPHOS LTD.,
corporations,

Counterclaim Plaintiffs,

VS.

FORTINET, INC., a corporation,

Counterclaim Defendant.

1 WHEREAS, the Court set a deadline for fact discovery of June 16, 2015 (Dkt. No. 110);

2 WHEREAS Plaintiff and Counterclaim-Defendant Fortinet, Inc. (“Fortinet”) and Defendants
3 and Counterclaim-Plaintiffs Sophos Inc. and Sophos Ltd. (collectively, “Sophos”) have agreed to
4 depositions of two of Fortinet’s Federal Rule of Civil Procedure 30(b)(6) designees, James Bray and
5 David Finger, after the discovery deadline, due to the scheduling constraints of Messrs. Bray and
6 Finger;

7 WHEREAS the parties have agreed that Mr. Bray will be deposed on June 17, 2015, beginning
8 at 9 a.m.;

9 WHEREAS the parties have agreed to a deposition of Mr. Finger on June 18, 2015, beginning
10 at 9 a.m.;

11 WHEREAS the parties do not seek to extend any other modification to the fact discovery
12 deadline;

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties that:

14 The parties respectfully request a continuation of the fact discovery deadline for the sole
15 purpose of the depositions of James Bray on June 17, 2015 and David Finger on June 18, 2015, with
16 no other modifications to the fact discovery deadline.

1 DATED: June 17, 2015

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

3 By /s/ John M. Neukom

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7 Attorneys for Plaintiff FORTINET, INC.
8

9 DATED: June 17, 2015

DLA PIPER LLP (US)

11 By /s/ Sean C. Cunningham

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15 Attorneys for Defendant and Counterclaim
16 Plaintiff SOPHOS INC. and Counterclaim
17 Plaintiff SOPHOS LTD.

19 **SIGNATURE ATTESTATION**

20 Pursuant to Local Rule 5.1(i)(3), I attest under penalty of perjury that concurrence in the filing
21 of this document has been obtained from David Knudson.

23 /s/ Grant N. Margeson

24 Grant N. Margeson

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FORTINET, INC., a corporation

Case No. 3:13-cv-05831-EMC

Plaintiff,

vs.

SOPHOS, INC., a corporation, MICHAEL VALENTINE, an individual, and JASON CLARK, an individual.

Defendants.

SOPHOS INC. and SOPHOS LTD., corporations,

Counterclaim Plaintiffs,

vs.

FORTINET, INC., a corporation,

Counterclaim Defendant.

[PROPOSED] ORDER EXTENDING FACT DISCOVERY DEADLINE FOR TWO DEPOSITIONS

PURSUANT TO STIPULATION, IT IS SO ORDERED. The fact discovery deadline is extended for the sole purpose of the depositions of James Bray on June 17, 2015 and David Finger on June 18, 2015, with no other modifications to the fact discovery deadline.

Dated: _____, 2015 By: _____

HONORABLE EDWARD M. CHEN